

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Proposal to Revise Multichannel Multi-	)	RM-10586
point Distribution Service and the	)	
Instructional Television Fixed Service	)	
Rules		

To: The Wireless Telecommunications Bureau

**JOINT COMMENTS OF ITFS PARTIES**

Akron City School District, Arizona State Board of Regents for Benefit of the University of Arizona, Belmont University, California State University (Calnet), California State University, Fullerton, Central Union High School District, Copley-Fairlawn City School District, Escondido Union School District, George Mason University Instructional Foundation, Gonzaga University Telecommunications Association, Imperial County Community College, Imperial County Office of Education, INTELECOM Intelligent Telecommunications, Johnson & Wales University, Kentucky Authority for Educational Television, Lane Community College, Linn-Benton Community College, Meadows Union School District, Milwaukee Area Technical College, Northeastern Educational Television of Ohio, Inc., Oceanside Unified School District, Oklahoma Educational Television Authority, Oregon State University, Oregon University System, Palomar College, Portland Community College, Portland State University, Regents of the University of Minnesota, Regional Educational Media Center IX, Revere Local School District, Rock Valley College, San Diego County Superintendent of Schools, San Diego State University, School Board of Manatee County, Seeley Union School District, South Carolina Educational Television Commission, Southern Oregon University, Spokane Community College;

Spokane Falls Community College, St. Louis Regional Educational and Public Television Commission, St. Petersburg College, State of Wisconsin – Educational Communications Board, University of Maine System, University of Maryland, Vista Unified School District, Western Oregon University, WITF, Inc. (collectively, “ITFS Parties”) submit these comments in response to Public Notice DA 02-2732 (released October 17, 2002), relating to the proposal by the Wireless Communications Association International, Inc., the National ITFS Association, and the Catholic Television Network (Proponents) for comprehensive rule changes for the MMDS and ITFS services.

The ITFS Parties are public and private universities and university systems, school districts, consortia of educators engaged in distance learning, and governmental educational telecommunications entities. The ITFS Parties include experienced licensees of ITFS stations providing critical educational services to students and other learners in schools, workplaces and homes; indeed, the ITFS Parties are operators of some of the oldest, largest and most innovative ITFS systems in the country.

The ITFS Parties enthusiastically support the “Proposal for Revising the MDS and ITFS Regulatory Regime” (“Proposal”) submitted by the Proponents on October 7, 2002. Many of the ITFS Parties have moved or contemplate moving away from traditional one-way video-based distance learning activities over ITFS, and they believe that their educational telecommunications endeavors will be substantially furthered by making available substantial spectrum that can actually be used effectively and efficiently for two-way broadband data communications. Others continue to need to provide one-way video services, but understand that these services will be protected in the new band plan and rules, while making possible new broadband data services and attractive excess capacity leasing opportunities. All the ITFS

Parties understand that it is necessary, for technical, operational, regulatory and other reasons to move to a new band plan and more streamlined regulatory environment. The Proposal accomplishes these goals.

The ITFS Parties urge the FCC to move swiftly to an NPRM and the adoption of final rules so that current uncertainties can be resolved and new services can be rolled out across the United States in the earliest timeframe. They also urge the FCC to endorse the Proposal in its entirety, without material alterations, given that the Proposal contemplates a very carefully crafted and massively interrelated structure that works as proposed, but may not successfully work if certain components are missing or others are added.

#### Conclusion

For the foregoing reasons, the ITFS Parties support the Proposal and urge its swift endorsement and adoption by the FCC.

Respectfully submitted,

AKRON CITY SCHOOL DISTRICT

ARIZONA STATE BOARD OF REGENTS FOR  
BENEFIT OF THE UNIVERSITY OF  
ARIZONA

BELMONT UNIVERSITY

CALIFORNIA STATE UNIVERSITY (CALNET)

CALIFORNIA STATE UNIVERSITY,  
FULLERTON

CENTRAL UNION HIGH SCHOOL DISTRICT

COPLEY-FAIRLAWN CITY SCHOOL  
DISTRICT

ESCONDIDO UNION SCHOOL DISTRICT

GEORGE MASON UNIVERSITY  
INSTRUCTIONAL FOUNDATION

GONZAGA UNIVERSITY  
TELECOMMUNICATIONS  
ASSOCIATION

IMPERIAL COUNTY COMMUNITY COLLEGE

IMPERIAL COUNTY OFFICE OF EDUCATION

INTELECOM INTELLIGENT  
TELECOMMUNICATIONS

JOHNSON & WALES UNIVERSITY

KENTUCKY AUTHORITY FOR  
EDUCATIONAL TELEVISION

LANE COMMUNITY COLLEGE

LINN-BENTON COMMUNITY COLLEGE

MEADOWS UNION SCHOOL DISTRICT

MILWAUKEE AREA TECHNICAL COLLEGE

NORTHEASTERN EDUCATIONAL  
TELEVISION OF OHIO, INC.

OCEANSIDE UNIFIED SCHOOL DISTRICT

OKLAHOMA EDUCATIONAL TELEVISION  
AUTHORITY

OREGON STATE UNIVERSITY

OREGON UNIVERSITY SYSTEM

PALOMAR COLLEGE

PORTLAND COMMUNITY COLLEGE

PORTLAND STATE UNIVERSITY

REGENTS OF THE UNIVERSITY OF  
MINNESOTA

REGIONAL EDUCATIONAL MEDIA CENTER  
IX

REVERE LOCAL SCHOOL DISTRICT

ROCK VALLEY COLLEGE

SAN DIEGO COUNTY SUPERINTENDENT OF  
SCHOOLS

SAN DIEGO STATE UNIVERSITY

SCHOOL BOARD OF MANATEE COUNTY

SEELEY UNION SCHOOL DISTRICT

SOUTH CAROLINA EDUCATIONAL  
TELEVISION COMMISSION

SOUTHERN OREGON UNIVERSITY

SPOKANE COMMUNITY COLLEGE

SPOKANE FALLS COMMUNITY COLLEGE

ST. LOUIS REGIONAL EDUCATIONAL AND  
PUBLIC TELEVISION COMMISSION

ST. PETERSBURG COLLEGE

STATE OF WISCONSIN – EDUCATIONAL  
COMMUNICATIONS BOARD

UNIVERSITY OF MAINE SYSTEM

UNIVERSITY OF MARYLAND

VISTA UNIFIED SCHOOL DISTRICT

WESTERN OREGON UNIVERSITY

WITF, INC.

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